

Justin T. Quinn
ROBINSON MILLER LLC
One Newark Center, 19th Floor
Newark, New Jersey 07102
973-690-5400
jquinn@rwmlegal.com

Attorneys for Defendants

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

WAG Acquisition, L.L.C.,

Plaintiff,

v.

Multi Media, L.L.C., *et al.*,

Defendants.

Civil Action No. 2:14-cv-02340
(ES)(MAH)

Hearing Date: August 21, 2017

**NOTICE OF JOINT MOTION
TO DISMISS OR, IN THE
ALTERNATIVE, MOTION TO
TRANSFER VENUE**

WAG Acquisition, L.L.C.,

Plaintiff,

v.

Data Conversions, Inc., *et al.*,

Defendants.

Civil Action No. 2:14-cv-02345
(ES)(MAH)

<div>WAG Acquisition, L.L.C., Plaintiff, v. Flying Crocodile, Inc., <i>et al.</i>, Defendants.</div>	Civil Action No. 2:14-cv-02674 (ES)(MAH)
<div>WAG Acquisition, L.L.C., Plaintiff, v. Gattyán Group S.à r.l., <i>et al.</i>, Defendants.</div>	Civil Action No. 2:14-cv-02832 (ES) (MAH)
<div>WAG Acquisition, L.L.C., Plaintiff, v. FriendFinder Networks Inc., <i>et al.</i>, Defendants.</div>	Civil Action No. 2:14-cv-03456 (ES)(MAH)
<div>WAG Acquisition, L.L.C., Plaintiff, v. Vubeology, Inc., <i>et al.</i>, Defendants.</div>	Civil Action No.2:14-cv-04531 (ES)(MAH)

WAG Acquisition, L.L.C.,

Plaintiff,

v.

WebPower, Inc., d/b/a WP Associates

et al.,

Defendants.

Civil Action No.2:15-cv-03581
(ES)(MAH)

TO: William T. Walsh, Clerk
United States District Court
District of New Jersey
Martin Luther King Building
& U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Ronald Abramson, Esq.
Lewis Baach Kaufmann Middlemiss PLLC
The Chrysler Building
405 Lexington Avenue, 62nd Floor
New York, New York 10174

PLEASE TAKE NOTICE that Defendants FriendFinder Networks Inc., Streamray Inc., Multi Media, LLC, WMM, LLC, WMM Holdings, LLC, WebPower, Inc., Accretive Technology Group, Inc., ICF Technology, Inc., Riser Apps LLC, Vubeology, Inc., Duodecad IT Services Luxembourg S.à r.l., and Docler Media LLC (collectively, “Defendants”), by and through their respective attorneys, hereby move for an Order dismissing the above-captioned matters or, in the alternative, transferring them to their proper venues in light of the Supreme Court’s

decision in *TC Heartland*, and pursuant to Fed. R. Civ. P. 12(b)(3) and 28 U.S.C. §§ 1400(b), 1406.

PLEASE TAKE FURTHER NOTICE that, in support of this joint motion, Defendants will rely upon the accompanying memorandum of law, the attendant party Declarations, and all other pleadings and memoranda on file in this matter.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that a Certification attesting to the date and manner of service also is submitted herewith.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Dated: July 28, 2017

Respectfully submitted,

s/ Justin T. Quinn

Justin T. Quinn

ROBINSON MILLER LLC

One Newark Center

Newark, NJ 07102

Telephone No.: (973) 690-5400

Facsimile No.: (973) 466-2760

JQuinn@rwmlegal.com

Attorneys for Defendants FriendFinder Networks Inc., Streamray Inc., Multi Media, LLC, WMM, LLC WMM Holdings, LLC, WebPower, Accretive Technology Group, Inc., ICF Technology Group, Inc., Riser Apps, LLC, Duodecad IT Services Luxembourg S.à r.l. and Docler Media LLC